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KING COUNTY
SUPERIOR COURT CLERK
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CASE NUMBER: 13-2-40293-9 SEA

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

R.P.,

Plaintiff,

v.

SEATTLE SCHOOL DISTRICT, a political
subdivision of the State of Washington,

Defendant.

NO.

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, by and through her attorneys of record, and by way of
claim allege, and upon information and belief upon all other matters, as follows:

I. PARTIES

1. Plaintiff R.P. is an adult woman residing in Seattle, Washington.
2. Defendant Seattle School District is a political subdivision of the State of
Washington and employer of David Wysen.

II. FACTS

3. When a student at Eckstein Middle School, Ms. Prince was sexually
propositioned and assaulted by her teacher, David Wysen, on multiple occasions upon the
school grounds.

COMPLAINT - 1 of 3

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1 4. Ms. Prince reported the improper conduct to school authorities but was left in
2 Mr. Wysen's classroom thereafter and the sexual predation continued.

3 5. As a result of the defendant's negligence, Ms. Prince suffered extreme
4 emotional distress and preventable sexual assaults and harassment.

5
6 **III. NEGLIGENCE**

7 6. Defendant's acts breached the standard of care and reasonableness owed to
8 Ms. Prince.

9 **IV. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

10 7. Defendant's acts breached the standard of care and reasonableness owed to
11 Ms. Prince causing her objective manifestations of trauma.

12 **V. TITLE IX – 20 U.S.C. 168**

13 8. Defendant's acts breached the standard of care and reasonableness owed to
14 Ms. Prince including creating a hostile school environment that negatively impacted Ms.
15 Prince.
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VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests a judgment against Defendant:

- (a) Awarding Plaintiff general damages including loss of consortium and special damages in an amount to be proven at trial;
- (b) Awarding her reasonable attorney's fees and costs as available under law,
- (c) Awarding her any and all applicable interest on the judgment; and
- (d) Awarding her such other and further relief as the Court deems just and proper under the circumstances of this case.

Respectfully submitted this 27th day of November, 2013.

CONNELLY LAW OFFICES

By 

Lincoln C. Beauregard, WSBA No. 32878
Attorneys for Plaintiff

STATE OF WASHINGTON } ss.
County of King

I, BARBARA MINER, Clerk of the Superior Court
of the State of Washington, for the County of King, do hereby certify
that I have compared the foregoing copy with the original instrument as
the same appears on file and of record in my office, and that the same
is a true and perfect transcript of said original and of the whole thereof.
IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the
Seal of said Superior Court at my office at Seattle this _____
day of DEC 12 2013 20_____

BARBARA MINER Superior Court Clerk
By THOMSON
Deputy Clerk

